KRAMER LEVIN NAFTALIS & FRANKEL LLP

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Coursel to the Ad Hoc Committee of

Governmental and Other Continuent Lities:

Governmental and Other Contingent Litigation Claimants

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11 : Case No. 19-23649 (RDD)

Debtors. 1 : Case No. 19-23649 (RDD)

TENTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH DECEMBER 31, 2022

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The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant	Kramer Levin Naftalis & Frankel LLP
Authorized to Provide Professional Services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019
Interim Fee Period:	September 1, 2022 through and including December 31, 2022
Fees Requested for this Interim Fee Period:	\$217,161.50
Expenses Requested for this Interim Fee Period:	\$7,400.36
Total Amount Requested for this Interim Fee Period:	\$224,561.86
Less Amount Paid to Date for this Interim Fee Period:	\$116,803.47
Net Amount to be Paid for this Interim Fee Period (20% holdback of fees for September and October and 100% for November and December):	\$107,758.39
Blended Rate in this Application for All Attorneys:	\$1,252.02
Blended Rate in this Application for All Timekeepers:	\$1,170.68
Number of Professionals Included in this Application:	12
Number of Professionals Billing Fewer than 15 Hours to the Case During this Period:	8
If applicable, number of professionals in this application not included in staffing plans:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	Fees incurred were less than budgeted fees for this period.
Any rate increases during the Tenth Interim Fee Period?	No
This is a(n): monthlyX interi	m application final application

SUMMARY OF FEE STATEMENTS SUBJECT TO INTERIM PERIOD

Application	_	mpensation and Expenses Incurred for Period Covered		Total Amount Requested in Fee Statements		Total Unpaid
Date Filed/Docket No.	Period Covered	Total Fees	Expenses	Fees (80%)	Expenses (100%)	Fees and Expenses
11/3/2022 [Dkt. No. 5215]	9/1/2022- 9/30/2022	\$98,517.00	\$90.43	\$98,517.00	\$90.43	\$19,703.40
11/21/2022 [Dkt. No. 5250]	10/1/2022- 10/31/2022	\$41,151.00	\$4,978.64	\$32,920.80	\$4,978.64	\$8,230.20
1/13/2023 [Dkt. No. 5339]	11/1/2022- 11/30/2022	\$33,987.00	\$2,195.19	\$27,189.60	\$2,195.19	\$36,182.19
2/1/2023 [Dkt. No. 5396]	12/1/2022- 12/31/2022	\$43,506.50	\$136.10	\$34,805.20	\$136.10	\$43,642.60
Totals:		\$217,161.50	\$7,400.36	\$193,432.60	\$7,400.36	\$107,758.39

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

Date Filed/Docket	Period Covered	Fees Requested	Expenses Requested	Fees Paid	Expenses Paid	Order
No. 3/16/2020	9/16/2019-	\$2,635,092.25	\$47,449.28	\$2,616,629.54	\$47,449.28	Dkt. Nos.
[Dkt. No. 957]	1/31/2020				·	1159 & 1306
	First Interim Period ²					
7/20/2020	2/1/2020-	\$1,568,914.50	\$92,717.65	\$1,556,969.50	\$92,697.65	Dkt. No. 1649
[Dkt. No. 1459]	5/31/2020					
	Second					
	Interim					
	Period ³					
11/17/2020	6/1/2020-	\$1,698,836.50	\$69,971.34	\$1,668,836.50	\$69,971.34	Dkt. Nos.
[Dkt. No. 1996]	9/30/2020					2144 & 2353
	Third					
	Interim					
	Period ⁴					
3/17/2021	10/1/2020-	\$3,818,924.65	\$60,444.15	\$3,818,924.50	\$60,444.15	Dkt. No. 2698
[Dkt. No. 2529]	1/31/2021					
	Fourth					
	Interim					
	Period and					

² At the request of the fee examiner, Applicant agreed to a reduction of \$18,462.71 in fees and expenses.

³ At the request of the fee examiner, Applicant agreed to a reduction of \$11,965.00 in fees and expenses.

⁴ At the request of the fee examiner, Applicant agreed to a reduction of \$30,000.00 in fees and expenses.

	Allocation Fees ⁵					
7/15/2021	2/1/2020-	\$3,922,853.00	\$14,335.04	\$3,891,992.00	\$14,335.04	Dkt. No. 3603
[Dkt. No. 3234]	5/31/2021					
	Fifth					
	Interim					
11/15/2021	Period ⁶	ΦΕ (Ε1 (Q5 Ε0	ФС1 C24 Q4	ΦE (2) (25 50	ФС1 CO4 O4	DI. N. 4027
11/15/2021	2/1/2020- 5/31/2021	\$5,651,625.50	\$61,624.84	\$5,626,625.50	\$61,624.84	Dkt. No. 4237
[Dkt. No. 4142]	5/51/2021 Sixth					
	Interim					
	Period ⁷					
3/17/2022	10/1/2021-	\$3,832,741.50	\$67,611.02	\$3,805,708.50	\$67,562.01	Dkt. No. 4716
[Dkt No. 4562]	1/31/2022		·			
	Seventh					
	Interim					
	Period ⁸					
5/16/2022	2/1/2022-	\$1,578,687.50	\$22,132.43	\$1,578,687.50	\$22,132.43	Dkt. No. 4927
[Dkt No. 4841]	4/30/2022					
	Eighth					
	Interim Period					
10/17/2022	5/1/2022-	\$599,076.00	\$263,157.10	\$599,076.00	\$263,157.10	Dkt. No. 5256
[Dkt No. 5180]	8/31/2022	Ψ377,070.00	Ψ203,137.10	Ψ377,070.00	Ψ203,137.10	DRI. 140. 3230
[= 101,0,0100]	Ninth					
	Interim					
	Period					

⁵ At the request of the fee examiner, Applicant agreed to a reduction of \$30,000 in fees. The Fourth Interim Fee Application also requested payment of \$1,585,682.00 in separate fees incurred from October 11, 2019 through and including September 30, 2020 relating to allocation of value among the Debtors' creditors ("Allocation Fees"). Allocation Fees were separately approved by the Court on December 22, 2020 with the entry of the Second Supplemental Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals [Docket No. 2190].

⁶ At the request of the fee examiner, Applicant agreed to a reduction of \$30,861.00 in fees.

⁷ At the request of the fee examiner, Applicant agreed to a reduction of \$25,000.00 in fees.

⁸ At the request of the fee examiner, Applicant agreed to a reduction of \$27,082.01 in fees and expenses.

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Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

UNITED STATES	BANKRUPTCY	COURT
SOUTHERN DIST	RICT OF NEW	VORK

	X
In re:	: Chapter 11
PURDUE PHARMA L.P, et al.,	: Case No. 19-23649 (RDD
Debtors. ¹	: :
	: x

TENTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH DECEMBER 31, 2022

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¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

TO: THE HONORABLE ROBERT D. DRAIN UNITED STATES BANKRUPTCY JUDGE:

Kramer Levin Naftalis & Frankel LLP (the "Applicant" or "Kramer Levin"), co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "Ad Hoc Committee") of the above-captioned debtors and debtors-in-possession (the "Debtors") in these Chapter 11 Cases, hereby submits its Tenth Interim Application (the "Application") for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period from September 1, 2022 through December 31, 2022 (the "Tenth Interim Fee Period"), pursuant to title 11 of the United States Code (the "Bankruptcy Code") Sections 330(a) and 331, the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") Rule 2016, and the Local Bankruptcy Rules for the Southern District of New York (the "Local Bankruptcy Rules") Rule 2016-1, for the interim allowance of compensation for the professional services performed by Kramer Levin for and on behalf of the Ad Hoc Committee and reimbursement of its actual and necessary expenses for the Tenth Interim Fee Period. In support of the Application, Kramer Levin respectfully represents as follows:

JURISDICTION

- 1. The United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334.
- 2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

PRELIMINARY STATEMENT

3. During the Tenth Interim Fee Period, Kramer Levin continued to actively represent the Ad Hoc Committee in all aspects of these Chapter 11 Cases. However, in light of the appeals

pending before the Second Circuit of the *Findings of Fact, Conclusions of Law, and Order Confirming the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [Dkt. No.3787] (the "Confirmation Order"), Kramer Levin continued to minimize time expended during the Tenth Interim Fee Period. The Ad Hoc Committee's efforts were largely focused on developing a strategy and preparing next steps to address the pending Second Circuit ruling and its implication on the Debtors' emergence and continuing to evaluate the Debtors' business operations.

- 4. In addition, Kramer Levin worked diligently to ensure that the Ad Hoc Committee and its professionals were appropriately informed of all case updates through: (i) monitoring the filings, pleadings, and other developments in the Chapter 11 Cases to ensure the Ad Hoc Committee was up-to-date on the status of the case; (ii) hosting Ad Hoc Committee and working group calls and disseminating extensive and detailed e-mail reports and other correspondence with the Ad Hoc Committee members; and (iii) addressing the questions of Ad Hoc Committee members inquiring about the status and disposition of the case.
- 5. Accordingly, Kramer Levin respectfully submits that its services during the Tenth Interim Fee Period warrant approval of its requested fees and expenses.

SUMMARY OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT OF EXPENSES REQUESTED

6. This Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on January 23, 2013 (the "Local Guidelines"), as amended, and the United States Trustee for the Southern District of New York (the "UST") Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "UST Guidelines"), the Order Establishing Procedures for

Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 529] (the "Interim Compensation Order," collectively with the Local Guidelines and UST Guidelines, the "Guidelines"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals [Docket No. 553] (the "Fee Assumption Order"). Pursuant to the Local Guidelines, a certification of Kenneth H. Eckstein regarding compliance with the same is attached as Exhibit A hereto.

- 7. Kramer Levin seeks the interim allowance of fees for professional services rendered during the Tenth Interim Fee Period in the aggregate amount of \$217,161.50 (the "<u>Tenth Interim</u> <u>Fees</u>") and reimbursement of expenses incurred in connection with the rendition of those services in the aggregate amount of \$7,400.36 (the "<u>Tenth Interim Expenses</u>"). Kramer Levin's attorneys and paraprofessionals expended a total of approximately 185.50 hours for which compensation is requested.
- 8. There is no agreement or understanding between Kramer Levin and any other person, other than members of Kramer Levin, for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.
- 9. The fees charged by Kramer Levin in these Chapter 11 Cases are billed in accordance with its existing billing rates in effect during the Tenth Interim Fee Period.
- 10. During the course of these Chapter 11 Cases, Kramer Levin exercised its billing discretion and, as discussed in more detail below, voluntarily wrote off certain fees and expenses. Kramer Levin's decision to apply these write-offs of fees and expenses has resulted in savings to the estates during this Tenth Interim Fee Period of \$1,502.00.
- 11. Kramer Levin's rates for the services rendered by its professionals and paraprofessionals in these Chapter 11 Cases are the same rates that Kramer Levin charges for such

professional and paraprofessional services rendered in comparable non-bankruptcy matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

- 12. Pursuant to the UST Guidelines, annexed hereto as **Exhibit B** is a schedule setting forth all professionals and paraprofessionals employed by Kramer Levin who have performed services in these Chapter 11 Cases during the Tenth Interim Fee Period, the capacities in which each such individual is employed by Kramer Levin, the department in which each individual practices, the year in which the individual was licensed to practice law in the state of New York, the hourly billing rate charged by Kramer Levin for services performed by such individual, and the aggregate number of hours expended and fees billed.
- 13. Annexed hereto as **Exhibit C** is a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each such expense category. Annexed hereto as **Exhibit D** is Kramer Levin's detail of disbursements and expenses and a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each expense category for the Tenth Interim Fee Period.
- 14. Pursuant to the UST Guidelines, annexed hereto as **Exhibit E** is a summary of Kramer Levin's time billed during the Tenth Interim Fee Period, broken down by project categories as hereinafter described.
- 15. Kramer Levin maintains computerized records of the time spent by all of Kramer Levin's attorneys and paraprofessionals in connection with its representation of the Ad Hoc Committee. These records were used to prepare detailed time descriptions in accordance with the UST Guidelines and organized by project codes. These detailed time records, along with the detailed listings of the expenses incurred in connection with the services rendered, were submitted

to the Court (with notice given in accordance with the Interim Compensation Order and Fee Assumption Order) as part of the Monthly Fee Statements (defined below). Copies of the final detailed time records and expenses for the Tenth Interim Fee Period are being provided herewith to the Court and the Notice Parties, and are attached hereto as **Exhibit F**.

- 16. Since the commencement of these Chapter 11 Cases, Kramer Levin has provided the Court with a Monthly Fee Statement for each month for which compensation was sought pursuant to the Interim Compensation Order established in these Chapter 11 Cases. During the Tenth Interim Fee Period, Kramer Levin provided the appropriate Court with the following monthly fee statements:
 - a. For September 1, 2022 through and including September 30, 2022, fees of \$98,517.00 and expenses of \$90.43 (the "September Fee Statement");
 - b. For October 1, 2022 through and including October 31, 2022, fees of \$41,151.00 and expenses of \$4,978.64 (the "October Fee Statement");
 - c. For November 1, 2022 through and including November 30, 2022, fees of \$33,987.00 and expenses of \$2,195.19 (the "November Fee Statement"; and
 - d. For December 1, 2022 through and including December 31, 2022, fees of \$43,506.50 and expenses of \$136.10 (the "December Fee Statement," collectively with the September Fee Statement, the October Fee Statement, and the November Fee Statement, the "Monthly Fee Statements").
- 17. In total, Kramer Levin has submitted Monthly Fee Statements during the Tenth Interim Fee Period for fees of \$217,161.50 and expenses of \$7,400.36. As of the date of this Application, no notice party has objected to the Monthly Fee Statements.

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18. Prior to the service of each Monthly Fee Statement, Kramer Levin conducted an internal review of fees and expenses incurred during that month. As a result of such review, Kramer Levin wrote off a total of \$1,424.00 in fees and \$78.00 in expenses. The Monthly Fee Statements reflected the reduced amount after write-offs. Accordingly, Kramer Levin hereby seeks allowance of fees incurred for the Tenth Interim Fee Period in the amount of \$217,161.50, and the reimbursement of actual and necessary expenses incurred for the Tenth Interim Fee Period in the amount of \$7,400.36.

- 19. In accordance with the Interim Compensation Order, Kramer Levin sought payment of 80% of its fees and 100% of its expenses incurred, pursuant to each Fee Statement filed with the Court.
- 20. In total, therefore, pursuant to this Application, Kramer Levin respectfully requests that the Court enter an order awarding Kramer Levin, on an interim basis, fees in an aggregate amount of \$217,161.50 and the reimbursement of actual and necessary expenses Kramer Levin incurred during the Tenth Interim Fee Period in the aggregate amount of \$7,400.36. Kramer Levin requests payment of 20% of its fees that have been held back for the Fee Statements.
- 21. To the extent that time or disbursement charges for services rendered or expenses incurred relate to the Tenth Interim Fee Period, but were not processed prior to the preparation of this Application, Kramer Levin reserves the right to request compensation for such services and reimbursement of such expenses in a future application.
- 22. A budget and staffing plan for the Tenth Interim Fee Period is attached hereto as **Exhibit G**, which includes a comparison to actual amounts.²

² A non-itemized monthly budget was provided to the Debtors for the period covered by this Application. An itemized budget is included with this Application for convenience. The fees sought in this Application are not, in the aggregate, more than 10% higher as compared to the non-itemized budget.

- 23. Kramer Levin's rates in these Chapter 11 Cases are consistent with the rates charged by Kramer Levin to its non-bankruptcy clients. These rates are similar to the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy and bankruptcy cases in a competitive national legal market. Pursuant to the U.S. Trustee Guidelines, **Exhibit H** discloses the blended hourly rates for all non-bankruptcy timekeepers in the New York office of Kramer Levin and the blended hourly rates for timekeepers who billed to the Committee during the Tenth Interim Fee Period.
- 24. Prior to filing this Application, Kramer Levin provided the Ad Hoc Committee with a copy of the Application.

BACKGROUND

- 25. On September 15, 2019, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Bankruptcy Code Sections 1107 and 1108.
- 26. The Ad Hoc Committee consists of (i) ten States, (ii) the PEC, (iii) six political subdivisions of States, and (iv) one federally recognized American Indian tribe, as identified in the verified statement filed pursuant to Bankruptcy Rule 2019 at Docket Number 279.
- 27. The Ad Hoc Committee is represented in these bankruptcy cases by the following counsel: (i) Kramer Levin Naftalis & Frankel LLP, as lead bankruptcy counsel; (ii) Brown Rudnick LLP, as coordinating counsel for the non-state members of the Ad Hoc Committee, including the PEC; (iii) Otterbourg P.C., as coordinating counsel for the state members of the Ad Hoc Committee; and (iv) Gilbert LLP, as mass tort, deal and insurance counsel. In addition, the Ad Hoc Committee has retained financial professionals to assist in, among other things, conducting diligence relating to the Settlement Term Sheet, and evaluating and structuring the complex sale and M&A transactions for the Sackler assets.

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28. On October 29, 2019, the Debtors filed the Motion to Assume the Prepetition

Reimbursement Agreement with the Ad Hoc Committee, and to Pay the Fees and Expenses of the

Ad Hoc Committee's Professionals [Docket No. 394] (the "Fee Assumption Motion").

29. On December 2, 2019, the Court granted the Fee Assumption Motion by entering

the Fee Assumption Order.

SUMMARY OF LEGAL SERVICES RENDERED

30. During the Tenth Interim Fee Period, the Ad Hoc Committee worked with other

case constituencies primarily to strategize and address issues currently on appeal before the Second

Circuit and evaluate the Debtors' business operations. The following summary is not a detailed

description of the work performed, as the day-to-day services and the time expended in performing

such services are fully set forth in **Exhibit F**. Rather, the following summary highlights certain

areas in which services were rendered to the Ad Hoc Committee and identifies some of the issues

to which Kramer Levin devoted significant time and effort during the Tenth Interim Fee Period.

The summary is divided according to the project billing codes, which were created 31.

by Kramer Levin (in coordination with the other professionals for the Ad Hoc Committee) to best

reflect the categories of tasks that it was required to perform in connection with these Chapter 11

Cases. Nevertheless, given the interconnectedness of the issues in these Chapter 11 Cases, certain

of these categories may overlap with others.³

Α. **Business Operations**

Billing Code: 00003

(Fees: \$12,768.00 / Hours Billed: 10.30)

32. During the Tenth Interim Fee Period, Kramer Levin continued working with its

financial advisors to, among other things, evaluate the Debtors' public health initiatives, de

³ The fees and hours for each matter listed below reflect the voluntary write-offs and reductions of the Monthly Fee

Statements discussed above.

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minimis asset sale procedures, and ongoing business operations. The analysis provided by Kramer

Levin was necessary in guiding the Ad Hoc Committee to determine the best course of action in

regard to these proposals.

C. **Case Administration**

Billing Code: 00004

(Fees: \$756.00 / Hours Billed: 1.30)

33. During the Tenth Interim Fee Period, Kramer Levin was required to perform

discrete administrative tasks necessary to assist the Ad Hoc Committee and its professionals in

functioning efficiently, including, but not limited to: maintaining work-in-progress reports and

work streams; internal organizational meetings and organizational meetings among professionals;

monitoring calendars of critical dates; preparing materials for internal distribution; coordinating

conferences and meetings with Ad Hoc Committee professionals; obtaining filed pleadings and

maintaining case folders of the same; and routine communications and correspondences.

D. **Employment and Fee Applications**

Billing Code: 00006

(Fees: \$30,585.00 / Hours Billed: 36.40)

In the course of the Tenth Interim Fee Period, Kramer Levin prepared, filed and 34.

served several monthly fee statements, and reviewed and coordinated the monthly fee statements

of other Ad Hoc Committee professionals filed in these Chapter 11 Cases.

35. This matter also includes time spent reviewing Kramer Levin's and other Ad Hoc

Committee professionals' monthly invoices for compliance with UST Guidelines and for privilege

and confidentiality concerns, and coordinating filing of such invoices with the Bankruptcy Court.

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E. Litigation

Billing Code: 00008

(Fees: \$58,534.00 / Hours Billed: 56.50)

36. Kramer Levin's fees in this category during the Tenth Interim Fee Period include,

but are not limited to, monitoring Purdue's ongoing patent trial against Accord Healthcare and

preparing reports for the Ad Hoc Committee members on the status of same.

F. Meetings and Communications with Ad Hoc Committee & Creditors

Billing Code: 00009

(Fees: \$34,851.50 / Hours Billed: 24.80)

37. During the Tenth Interim Fee Period, the Ad Hoc Committee held calls with the

full Ad Hoc Committee or a subset thereof once a week (if not more often when the exigencies of

the case required). The general purpose of these meetings was to keep the Ad Hoc Committee

members informed of developments and current issues in these Chapter 11 Cases, and to discuss

and analyze Ad Hoc Committee positions with respect to matters requiring their input. Ad Hoc

Committee meetings required preparation by Kramer Levin professionals and other Ad Hoc

Committee professionals and often included multiple agenda items.

38. Kramer Levin coordinated with the Ad Hoc Committee's other professionals on

these meetings, on tasks including drafting and setting agendas and preparing and reviewing

materials.

39. In addition, Kramer Levin provided the Ad Hoc Committee with frequent detailed

e-mail updates of recently filed pleadings, case issues and negotiations, and other items relevant

to the Chapter 11 Cases.

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G. Non-Working Travel

Billing Code: 00010

(Fees: $$1,424.00 / \overline{\text{Hours Billed: 3.20}}$)

40. This non-working travel matter includes time spent traveling to and from Delaware

to attend the Accord patent trial. All fees incurred for non-working travel time will be billed at

50% and the billed time reflects this reduction.

H. Plan and Disclosure Statement

Billing Code: 00011

(Fees: \$78,243.00 / Hours Billed: 53.0)

41. During the Tenth Interim Fee Period, Kramer Levin worked to address issues

currently on appeal before the Second Circuit with respect to the Confirmation Order and Chapter

11 Plan. To minimize delays following the Second Circuit's decision, Kramer Levin evaluated

paths forward under various Second Circuit outcomes. Kramer Levin also had frequent

discussions with the Debtors and the Creditors' Committee, as well as other key constituencies, in

an effort to strategize and address issues currently on appeal.

STATEMENT OF KRAMER LEVIN

42. The foregoing professional services performed by Kramer Levin were appropriate

and necessary. The professional services were in the best interests of the Ad Hoc Committee, the

Debtors' estates and other parties-in-interest. Compensation for the foregoing professional

services as requested is commensurate with the complexity, importance and nature of the

problems, issues or tasks involved. The professional services were performed in an appropriately

expeditious and efficient manner.

43. The majority of the services performed by Kramer Levin were rendered by Kramer

Levin's Corporate Restructuring and Bankruptcy Group. Kramer Levin has a prominent practice

in this area and enjoys a national reputation for its expertise in financial reorganizations and

restructurings. The attorneys at Kramer Levin have substantial experience representing creditor

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groups in many chapter 11 cases. In addition, due to the facts and circumstances of these Chapter 11 Cases, attorneys from Kramer Levin's corporate practice group, as well as attorneys in other specialized areas as necessary, were involved with Kramer Levin's representation of the Ad Hoc Committee. Overall, Kramer Levin brings a particularly high level of skill and knowledge which has inured to the benefit of the Ad Hoc Committee in this case.

- 44. The professional services performed by Kramer Levin on behalf of the Committee during the Tenth Interim Fee Period required an aggregate expenditure of approximately 185.50 recorded hours by Kramer Levin's members, counsel, associates and paraprofessionals. Of the aggregate time expended, 72.70 recorded hours were expended by partners and counsel of Kramer Levin, 95.10 recorded hours were expended by associates, and 17.70 recorded hours were expended by paraprofessionals of Kramer Levin.
- 45. During the Tenth Interim Fee Period, Kramer Levin's hourly billing rates for attorneys ranged from \$785 to \$1,685 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate for attorneys of approximately \$1,252.02 per hour (based upon 167.80 recorded hours for professionals at Kramer Levin's regular billing rates in effect at the time of the performance of professional services), and a total blended hourly billing rate for Kramer Levin's paraprofessionals of \$480.00 per hour (based upon 17.70 recorded hours for paraprofessionals at Kramer Levin's regular billing rates in effect at the time of the performance of the services).
- 46. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy cases in a competitive national legal market. As noted, attached hereto in **Exhibit B** is a schedule listing each Kramer Levin professional and paraprofessional who performed services in these Chapter 11 Cases during the

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Tenth Interim Fee Period, the hourly rate charged by Kramer Levin for services performed by each individual, and the aggregate number of hours and charges by each individual. Kramer Levin provided a copy of the Application to the Ad Hoc Committee prior to filing the Application and received no objection to its filing.

ACTUAL AND NECESSARY EXPENSES OF KRAMER LEVIN

- 47. As set forth in **Exhibit C** hereto, Kramer Levin has disbursed \$7,400.36 as expenses incurred in providing professional services during the Tenth Interim Fee Period. Pursuant to Kramer Levin's policies (which we believe are comparable to those of other New York City law firms), Kramer Levin has (and will continue) to pay certain expenses of professionals who work past 8:00 p.m. and on weekends and holidays in the service of its clients, and/or for business travel, including to and from Court hearings or remote meetings. These expenses include meal charges and car fares. Consistent with the U.S. Trustee Guidelines, Kramer Levin has also voluntarily reduced its request for reimbursement for late-working professionals' meal charges to \$20 per meal to the extent that such meal charges were in excess of this limit.
- 48. With respect to photocopying expenses, Kramer Levin charged \$0.10 per page. Kramer Levin does not charge for facsimile transmissions, other than the cost of long distance facsimiles at applicable toll charge rates, which invariably are less than \$1.25 per page, as permitted by the Guidelines. Each of these categories of expenses falls below the maximum rates set by the Guidelines. These charges are intended to cover Kramer Levin's direct operating costs, which costs are not incorporated into Kramer Levin's hourly billing rates. Only clients who actually use services of the types set forth in **Exhibit C** are separately charged for such services.

- 49. In addition, due to the locations of Ad Hoc Committee members, long-distance telephone calls were often required. These disbursements are not included in Kramer Levin's overhead for the purpose of setting billing rates.
- 50. Kramer Levin has made every effort to minimize its disbursements in these cases. The actual expenses incurred in providing professional services were absolutely necessary, reasonable, economical, and justified under the circumstances to enable Kramer Levin to serve the needs of the Ad Hoc Committee.
- 51. The members of the Ad Hoc Committee also incurred certain expenses in the performance of their duties as members of the Ad Hoc Committee. This Application seeks allowance of these necessary disbursements by the Ad Hoc Committee members, in accordance with the terms of the Fee Assumption Order.

THE REQUESTED COMPENSATION SHOULD BE ALLOWED

52. The Fee Assumption Order provides that Kramer Levin's reasonable and documented fees and expenses shall be subject, *mutatis mutandis*, to the procedures with respect to the authorization of payment of the fees and expenses of the professionals of the Debtors and the UCC as set forth in the Interim Compensation Order. Therefore, while this Application is not strictly subject to sections 331 and 330 of the Bankruptcy Code, we are guided by such provisions in making this Application. Section 331 of the Bankruptcy Code provides for interim

compensation of professionals and incorporates the substantive standards of 11 U.S.C. § 330 to govern the Bankruptcy Court's award of such compensation.

53. Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

54. Here, Kramer Levin respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for, beneficial to, and in the best interests of, the Ad Hoc Committee. Kramer Levin further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Ad Hoc Committee. The services rendered by Kramer Levin were consistently performed in a timely and efficient manner commensurate with the complexity, importance, and

nature of the issues involved. Kramer Levin respectfully submits that approval of the compensation sought herein is warranted.

STATEMENT PURSUANT TO APPENDIX B OF THE GUIDELINES

- 55. The following is provided in response to the request for additional information set forth in the Guidelines.
 - a) Kramer Levin seeks reimbursement of fees and expenses that are permissible under the relevant rules, court orders, and Bankruptcy Code provisions. In addition, Kramer Levin provided voluntary write-offs of both fees and expenses during the Tenth Interim Fee Period in its discretion.
 - b) The fees and expenses sought in the Application are billed at rates customarily employed by Kramer Levin, and generally accepted by Kramer Levin's clients. None of the professionals seeking compensation in the Application varied their hourly rate based on the geographic location of the Debtors' cases.
 - c) For the Tenth Interim Fee Period, Kramer Levin is not seeking fees that exceed, in the aggregate, non-itemized budgeted amounts for that period by more than 10%.
 - d) This Application includes certain time (and fees) related to preparing, reviewing, or revising fee statements to comply with the local bankruptcy rules and U.S. Trustee guidelines. These fees are reflected in a portion of the amount requested in billing code number 6, Employment and Fee Applications (which matter also includes time spent by Kramer Levin reviewing other professionals' employment and fee applications and reviewing time records to redact or address privileged or other confidential information). Such time was necessary in order to comply with applicable guidelines and the Interim Compensation Order and to file monthly fee applications (which is a distinct requirement in bankruptcy matters).
 - e) In connection with the preparation of its monthly invoices, Kramer Levin reviewed its monthly invoices at the time that they were filed for privilege and confidentiality. The Application includes fees incurred in conducting that review.
 - f) This Application includes three rate increases since Kramer Levin's retention. On March 16, 2020, March 17, 2021, and March 17 2022, respectively, Kramer Levin filed its Fourth, Sixteenth, and Twenty-Eighth Monthly Fee Statements where it disclosed that it had increased hourly rates charged by professionals as of January 1, 2020, January 1, 2021, and January 1, 2022, respectively, in accordance with its annual review process.

NOTICE

Notice of this Application has been provided in accordance with the Guidelines and the Interim Compensation Order. Because of the nature of the relief requested, the Ad Hoc Committee submits that such notice is sufficient and that no further notice of the relief requested in the Application need be given to any party.

CONCLUSION

WHEREFORE, Kramer Levin respectfully requests that the Bankruptcy Court enter an order: (i) authorizing the Debtors to pay the entirety of the unpaid balance of all approved fees for the Tenth Interim Period (including holdback amounts) and (ii) granting such other relief as is just and proper.

Dated: New York, New York

Respectfully submitted,

February 14, 2023

By: /s/ Kenneth H. Eckstein

Kenneth H. Eckstein Rachael Ringer Caroline F. Gange KRAMER LEVIN NAFTALIS &

KRAMER LEVIN NAFTALIS & FRANKEL LLP

1177 Avenue of the Americas New York, New York 10036 Telephone: (212) 715-9100

Fax: (212) 715-8000

Emails: keckstein@kramerlevin.com rringer@kramerlevin.com cgange@kramerlevin.com

Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Exhibit A

Certification of Kenneth H. Eckstein

KRAMER LEVIN NAFTALIS & FRANKEL LLP

Kenneth H. Eckstein Rachael Ringer Caroline F. Gange 1177 Avenue of the Americas New York, New York 10036 Telephone: (212) 715-9100

Facsimile: (212) 715-8000

Attorneys for the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

PURDUE PHARMA L.P, et al.,

Debtors.

Debtors.

Case No. 19-23649 (RDD)

CERTIFICATION UNDER GUIDELINES FOR FEES AND DISBURSEMENTS FOR PROFESSIONALS IN RESPECT OF TENTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH DECEMBER 31, 2022

_

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

- I, Kenneth H. Eckstein, hereby certify that:
- I am a member of Kramer Levin Naftalis & Frankel LLP (the "Applicant" or 1. "Kramer Levin") and co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "Ad Hoc Committee") of the above-captioned debtors and debtors-in-possession (the "Debtors") in these chapter 11 cases (the "Chapter 11 Cases"). Kramer Levin submits this tenth application for interim compensation and reimbursement of expenses in compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York adopted by the Bankruptcy Court on January 23, 2013 (the "Local Guidelines"), as amended, and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "UST Guidelines"), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 529] (the "Interim Compensation Order," collectively with the Local Guidelines and UST Guidelines, the "Guidelines"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals [Docket No. 553] (the "Fee Assumption Order").
- 2. This certification is made in respect of Kramer Levin's application, dated February 14, 2023 (the "<u>Application</u>"), for interim compensation and reimbursement of expenses for the period commencing September 1, 2022 through and including December 31, 2022 (the "<u>Tenth</u> <u>Interim Fee Period</u>") in accordance with the Guidelines.
 - 3. In respect of Section B.1 of the Local Guidelines, I certify that:
 - a. I have read the Application;
 - b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines and the UST Guidelines:

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- c. the fees and disbursements sought are billed at rates in accordance with the practices customarily employed by Kramer Levin and generally accepted by Kramer Levin's clients; and
- d. in providing a reimbursable service, Kramer Levin does not make a profit on that service, whether the service is performed by Kramer Levin in-house or through a third party.
- 4. I certify that the Creditors' Committee, Debtors, and U.S. Trustee will each be provided with a copy of the Application concurrently with the filing thereof and will have at least 14 days to review such Application prior to any objection deadline with respect thereto.

Dated: New York, New York February 14, 2023

/s/ Kenneth H. Eckstein
Kenneth H. Eckstein

Exhibit B

Summary of Professionals – Tenth Interim Fee Period
September 1, 2022 – December 31, 2022

Timekeeper	Title	Department	Year	Billed	Rate	Amount (\$)
			Admitted	Hours		
			to Bar			
David E.	Partner	Creditor's	2005	1.50	1,215	\$1,822.50
Blabey		Rights				
Jonathan S.	Partner	Intellectual	1993	10.20	1,425	\$14,535.00
Caplan		Property				
Kenneth H.	Partner	Creditor's	1980	34.10	1,685	\$57,458.50
Eckstein		Rights				
David J.	Partner	Corporate	1985	6.20	1,580	\$9,796.00
Fisher		•			·	·
Rachael	Partner	Creditor's	2011	2.70	1,315	\$3,550.50
Ringer		Rights			,	. ,
Adam C.	Partner	Creditor's	1989	7.00	1,555	\$10,885.00
Rogoff		Rights			,	,
Jordan M.	Partner	Corporate	2004	7.60	1,400	\$10,640.00
Rosenbaum		•			·	·
Joseph Shifer	Special	Special	2010	1.60	1,195	\$1,912.00
_	Counsel	Counsel				
Jeffrey Taub	Special	Corporate	2010	1.80	1,195	\$2,151.00
,	Counsel	1			ŕ	,
Caroline	Associate	Creditor's	2017	50.80	1,140	\$57,912.00
Gange		Rights			,	,
Sealteil,	Associate	Intellectual	2022	44.30	890	\$39,427.00
Ortega		Property				,
Rodriguez		1 3				
Wendy Kane	Paralegal	Creditor's	N/A	17.70	480	\$8,496.00
	. 6	Rights				1 - 7
	Subtotal			185.50		\$218,585.50
Les	s 50% Non-	Working Trave	l			(\$1,424.00)
TOTAL		0		185.50		\$217,161.50

$\underline{\textbf{Exhibit C}}$ Summary of Expenses/Disbursements

DESCRIPTION	AMOUNT (\$)
Bloomberg Law Online Research	\$60.93
Data Hosting Charges	\$6,302.07
Lexis Online Research	\$125.95
Local Transportation	\$57.00
Meals/T&E	\$63.91
Out-of-Town Travel	\$474.00
Pacer Online Research	\$36.00
Telecommunication Charges	\$6.90
Transcript Fees	\$273.60
TOTAL	\$7,400.36

Exhibit D

Detail of Disbursements Made During Tenth Interim Fee Period

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Kramer Levin



October 13, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 865595 072952 Page 1

FOR Disbursements rendered through September 30, 2022.

Disbursements and Other Charges

90.43

 ${\tt FEES}~{\tt AND}~{\tt DISBURSEMENTS}~{\tt POSTED}~{\tt AFTER}~{\tt THE}~{\tt BILLING}~{\tt PERIOD}~{\tt SHOWN}~{\tt ON}~{\tt THIS}~{\tt INVOICE}~{\tt WILL}~{\tt APPEAR}~{\tt ON}~{\tt A}~{\tt SUBSEQUENT}~{\tt INVOICE}.$

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



October 13, 2022 Invoice #: 865595

072952

DISBURSEMENTS AND OTHER CHARGES SUMMARY

DESCRIPTION	AMOUNT
Bloomberg Law Online Research	\$60.93
Pacer Online Research	29.50
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$90.43

DISBURSEMENTS AND OTHER CHARGES DETAIL

Bloomberg Law Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/15/2022	Schubeck Barbara	Bloomberg Law Online Research	\$60.93
Subtotal			\$60.93

Pacer Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/16/2022	Ortega-Rodriguez Sealtiel	Pacer Online Research Ortega- Rodriguez, Sealtiel	\$28.90
9/27/2022	Ortega-Rodriguez Sealtiel	Pacer Online Research Ortega- Rodriguez, Sealtiel	\$0.50
9/29/2022	Gange Caroline	Pacer Online Research Gange, Caroline	\$0.10
Subtotal			\$29.50
TOTAL			\$90.43

Kramer Levin



November 11, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 868353 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through October 31, 2022.

Disbursements and Other Charges

4,978.64

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



November 11, 2022 Invoice #: 868353 072952

DISBURSEMENTS AND OTHER CHARGES SUMMARY

DESCRIPTION	AMOUNT
Data Hosting Charges	\$4,201.38
Lexis Online Research	125.95
Local Transportation	57.00
Meals/T & E	63.91
Out-of-Town Travel	474.00
Transcript Fees	56.40
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$4,978.64

DISBURSEMENTS AND OTHER CHARGES DETAIL

Data Hosting Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/30/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
10/31/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
Subtotal			\$4,201.38

Lexis Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
10/20/2022	Blabey David E.	Lexis Online Research	\$125.95
Subtotal			\$125.95



November 11, 2022 Invoice #: 868353 072952

072952 Page 2

Local Transportation

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/19/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Parking: Expense Date: 09/19/22, Merchant: ParkFast #1	\$19.00
9/20/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Parking: Expense Date: 09/20/22, Merchant: ParkFast#1	\$19.00
9/21/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Parking: Expense Date: 09/21/22, Merchant: ParkFast #1	\$19.00
Subtotal			\$57.00

Meals/T & E

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/19/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Meal:Type: Travel Meals, Expense Date: 09/19/22, Merchant: Chelsea Tavern, Guest(s): Sealtiel Ortega- Rodriguez	\$23.00
9/20/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Meal:Type: Travel Meals, Expense Date: 09/20/22, Merchant: Dunkin, Guest(s): Sealtiel Ortega-Rodriguez	\$29.95



November 11, 2022 Invoice #: 868353

072952 Page 3

9/21/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Meal:Type: Travel Meals, Expense Date: 09/21/22, Merchant: Dunkin, Guest(s): Sealtiel Ortega-Rodriguez	\$10.96
Subtotal			\$63.91

Out-of-Town Travel

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/19/2022	Ortega-Rodriguez Sealtiel	Sealtiel Ortega-Rodriguez - Travel to Delaware by Amtrak Train / Rail: Expense Date: 09/19/22, Merchant: Amtrak	\$474.00
Subtotal			\$474.00

Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
10/27/2022	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Purdue Hearing Transcript, Transaction Date: 10/27/22, Invoice Number: 6132781	\$56.40
Subtotal			\$56.40
TOTAL			\$4,978.64

Kramer Levin



December 20, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 871320 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through November 30, 2022.

Disbursements and Other Charges

2,195.19

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



December 20, 2022 Invoice #: 871320 072952

DISBURSEMENTS AND OTHER CHARGES SUMMARY

DESCRIPTION	AMOUNT
Data Hosting Charges	\$2,100.69
Pacer Online Research	6.00
Telecommunication Charges	6.90
Transcript Fees	81.60
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$2,195.19

DISBURSEMENTS AND OTHER CHARGES DETAIL

Data Hosting Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
11/28/2022	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
Subtotal			\$2,100.69

Pacer Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
11/21/2022	Ortega-Rodriguez Sealtiel	Pacer Online Research Ortega- Rodriguez, Sealtiel	\$6.00
Subtotal			\$6.00



December 20, 2022 Invoice #: 871320 072952 Page 2

Telecommunication Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
9/1/2022	Fisher David J.	Telecommunication Charges by David Fisher	\$6.90
Subtotal			\$6.90

Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
11/18/2022	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing Transcript, Transaction Date: 11/18/22, Invoice Number: 6185509	\$81.60
Subtotal	•		\$81.60
TOTAL			\$2,195.19

Kramer Levin



January 27, 2023

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 873791 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through December 31, 2022.

Disbursements and Other Charges

136.10

 ${\tt FEES}~{\tt AND}~{\tt DISBURSEMENTS}~{\tt POSTED}~{\tt AFTER}~{\tt THE}~{\tt BILLING}~{\tt PERIOD}~{\tt SHOWN}~{\tt ON}~{\tt THIS}~{\tt INVOICE}~{\tt WILL}~{\tt APPEAR}~{\tt ON}~{\tt A}~{\tt SUBSEQUENT}~{\tt INVOICE}.$

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



January 27, 2023 Invoice #: 873791 072952

DISBURSEMENTS AND OTHER CHARGES SUMMARY

DESCRIPTION	AMOUNT
Pacer Online Research	\$0.50
Transcript Fees	135.60
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$136.10

DISBURSEMENTS AND OTHER CHARGES DETAIL

Pacer Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
12/2/2022	Kane Wendy	Pacer Online Research Kane, Wendy	\$0.50
Subtotal	•		\$0.50

Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
12/13/2022	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing transcript, Transaction Date: 12/13/22, Invoice Number: 6234156	\$135.60
Subtotal			\$135.60
TOTAL			\$136.10

$\underline{\textbf{Exhibit E}}$ Summary of Time by Billing Category

PURDUE PHARMA L.P., ET AL. AD HOC COMMITTEE				
Time by	Billing Category for September 1, 2022 through Dece	mber 31, 202	2	
<u>Matter Number</u>	<u>Matter Name</u>	Hours	<u>Fees (\$)</u>	
072952-00003	Business Operations	10.30	\$12,768.00	
072952-00004	Case Administration	1.30	\$756.00	
072952-00006	Employment and Fee Applications	36.40	\$30,585.00	
072952-00008	Litigation	56.50	\$58,534.00	
072952-00009	Meetings and Communications with Ad-Hoc	24.80	\$34,851.50	
	Committee & Creditors			
072952-00010	Non-Working Travel	3.20	\$2,848.00	
072952-00011	Plan and Disclosure Statement	53.00	\$78,243.00	
Subtotal	185.50	\$218,585.50		
Less 50% Non-Working Travel			(\$1,424.00)	
<u>TOTAL</u>		185.50	<u>\$217,161.50</u>	

Exhibit F

Final Detailed Time Records – Tenth Interim Fee Period September 1, 2022 through December 31, 2022

Kramer Levin



October 13, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 865595 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through September 30, 2022.

Fees \$98,517.00

Disbursements and Other Charges 90.43

TOTAL BALANCE DUE \$98,607.43

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



October 13, 2022 Invoice #: 865595

072952 Page 2

MATTER SUMMARY

For professional services rendered through September 30, 2022 in connection with the following matters:

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$90.43	\$90.43
072952-00003	Business Operations	3,534.00	0.00	3,534.00
072952-00006	Employment and Fee Applications	5,847.00	0.00	5,847.00
072952-00008	Litigation	46,535.00	0.00	46,535.00
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	14,058.00	0.00	14,058.00
072952-00011	Plan and Disclosure Statement	28,543.00	0.00	28,543.00
Subtotal 98,517.00 90.43				98,607.43
TOTAL CURRENT INVOICE			\$98,607.43	



October 13, 2022 Invoice #: 865595 072952-00003 Page 3

Business Operations

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	3.10	\$3,534.00
TOTAL FEES		3.10	\$3,534.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/19/2022	Gange, Caroline	Review updates on patent litigation and FDA.	0.50	\$570.00
9/23/2022	Gange, Caroline	Attend call w/ Company re FDA inspection (1.0) and follow up emails w/ FTI re same (0.1).	1.10	1,254.00
9/28/2022	Gange, Caroline	Review de minimis asset sale motion (0.5) and emails w/ AHC advisors re same (0.3).	0.80	912.00
9/30/2022	Gange, Caroline	Emails w/ FTI re de minimis asset motions and review same.	0.70	798.00
TOTAL			3.10	\$3,534.00



October 13, 2022 Invoice #: 865595 072952-00006 Page 4

Employment and Fee Applications

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	0.60	\$729.00
Gange, Caroline	Associate	3.10	3,534.00
Kane, Wendy	Paralegal	3.30	1,584.00
TOTAL FEES		7.00	\$5,847.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/1/2022	Blabey, David E.	Review and comment on June fee statement (0.5) and emails with W. Kane re same (0.1).	0.60	\$729.00
9/1/2022	Kane, Wendy	Revise June fee statement; emails w/ D. Blabey re same.	0.40	192.00
9/15/2022	Gange, Caroline	Review fee statements for privilege/confidentiality and compliance with UST guidelines.	1.00	1,140.00
9/15/2022	Kane, Wendy	File KL June fee statement.	0.20	96.00
9/16/2022	Gange, Caroline	Review outstanding fee statements for privilege, confidentiality and compliance with UST guidelines.	1.00	1,140.00
9/26/2022	Kane, Wendy	Review July fee statement and exhibits (0.5); review August fee statement for compliance with UST guidelines and local rules (0.5).	1.00	480.00



October 13, 2022 Invoice #: 865595 072952-00006 Page 5

Employment and Fee Applications

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/27/2022	Kane, Wendy	Revise July fee statement and prepare same for filing (0.3); review August fee statement revisions and email C. Gange re same (0.1); file July fee statement (0.2).	0.60	288.00
9/28/2022	Kane, Wendy	File Houlihan monthly fee statements (0.3); email A. Benjamin re same (0.1).	0.40	192.00
9/30/2022	Gange, Caroline	Review August fee statement for privilege/confidentiality and compliance with UST guidelines.	1.10	1,254.00
9/30/2022	Kane, Wendy	Prepare August fee statement and exhibits (0.5); review C. Gange comments to fee statement and revise same (0.2).	0.70	336.00
TOTAL			7.00	\$5,847.00



October 13, 2022 Invoice #: 865595 072952-00008 Page 6

Litigation

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Caplan, Jonathan S.	Partner	6.30	\$8,977.50
Eckstein, Kenneth H.	Partner	2.90	4,886.50
Gange, Caroline	Associate	1.10	1,254.00
Ortega-Rodriguez, Sealtiel	Associate	35.30	31,417.00
TOTAL FEES		45.60	\$46,535.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/15/2022	Caplan, Jonathan S.	Correspondence with K. Eckstein re upcoming Purdue patent trial (0.2); meeting with S. Ortega-Rodriguez re same, next step (0.4); follow-up correspondence re status (0.2); review docket report for upcoming trial (0.2).	1.00	\$1,425.00
9/15/2022	Eckstein, Kenneth H.	Review materials re patent trial (0.6); correspond with J. Caplan re same (0.2).	0.80	1,348.00
9/15/2022	Ortega-Rodriguez, Sealtiel	Review patents at issue in ANDA litigation (4.1); meet w/ J. Caplan re same (0.4); follow up correspondence re same (0.2).	4.70	4,183.00
9/15/2022	Gange, Caroline	Review emails from AHC professionals and background re patent litigation.	0.80	912.00



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Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/16/2022	Caplan, Jonathan S.	Review docket materials re patent trial (0.4); call with KL team re monitoring trial, next steps (0.6); review working group correspondence re same (0.2); review Pre-trial Order (0.4).	1.60	2,280.00
9/16/2022	Ortega-Rodriguez, Sealtiel	Call with J. Caplan and M. Colucci re Purdue v. Accord Anda litigation trial (0.6), review litigation history of trial to prepare (2.5).	3.10	2,759.00
9/19/2022	Eckstein, Kenneth H.	Review correspondence re Accord patent litigation (0.5), call with M. Diaz re same (0.4), call with J. Caplan re same (0.4).	1.30	2,190.50
9/19/2022	Caplan, Jonathan S.	Review update from patent trial (0.3); prepare email to Bankruptcy team (0.2); correspondence with S. Ortega-Rodriguez re same (0.3); call with K. Eckstein re same (0.4).	1.20	1,710.00
9/19/2022	Ortega-Rodriguez, Sealtiel	Attend ANDA trial of Purdue v. Accord (6.0); review notes and prepare summary of same (4.2).	10.20	9,078.00
9/20/2022	Caplan, Jonathan S.	Review trial update.	1.20	1,710.00
9/20/2022	Ortega-Rodriguez, Sealtiel	Attend ANDA trial of Purdue v. Accord (6.7), review notes and prepare summary of same (2.0).	8.70	7,743.00
9/21/2022	Caplan, Jonathan S.	Review update from Accord trial (0.8); correspondence with K. Eckstein re status, next steps (0.5).	1.30	1,852.50
9/21/2022	Ortega-Rodriguez, Sealtiel	Attend ANDA trial of Purdue v. Accord (6.0), review notes and prepare summary of same (2.6).	8.60	7,654.00



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Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/21/2022	Gange, Caroline	Emails w/ KL IP team re ongoing patent litigation.	0.30	342.00
9/22/2022	Eckstein, Kenneth H.	Call with M. Kessleman re Accord trial and issues (0.8).	0.80	1,348.00
TOTAL			45.60	\$46,535.00



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Meetings and Communications with Ad-Hoc Committee & Creditors

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Caplan, Jonathan S.	Partner	1.70	\$2,422.50
Eckstein, Kenneth H.	Partner	4.10	6,908.50
Ringer, Rachael L.	Partner	1.00	1,315.00
Gange, Caroline	Associate	1.90	2,166.00
Ortega-Rodriguez, Sealtiel	Associate	1.40	1,246.00
TOTAL FEES	10.10	\$14,058.00	

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/8/2022	Eckstein, Kenneth H.	Attend Working Group call re plan discussions (0.8).	0.80	\$1,348.00
9/13/2022	Ringer, Rachael L.	Attend call with working group re: plan (0.5).	0.50	657.50
9/13/2022	Eckstein, Kenneth H.	Prepare for (0.2) and attend Working Group call (0.5).	0.70	1,179.50
9/20/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
9/20/2022	Ringer, Rachael L.	Attend portion of working group call (0.5).	0.50	657.50
9/22/2022	Caplan, Jonathan S.	Prepare for (0.3) and attend working group call re patent trial, next steps (1.4).	1.70	2,422.50



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Meetings and Communications with Ad-Hoc Committee & Creditors

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/22/2022	Eckstein, Kenneth H.	Attend portion of Working Group call re patent litigation (0.8).	0.80	1,348.00
9/22/2022	Gange, Caroline	Attend working group call re patent litigation and next steps.	1.20	1,368.00
9/22/2022	Ortega-Rodriguez, Sealtiel	Attend call related to Accord v. Purdue case and next steps.	1.40	1,246.00
9/26/2022	Gange, Caroline	Emails w/ FTI re AHC update on FDA inspection; circulate AHC update re fees.	0.20	228.00
9/29/2022	Eckstein, Kenneth H.	Prep for (0.5) and attend Working Group call (0.5).	1.00	1,685.00
9/29/2022	Gange, Caroline	Attend working group call re current case status.	0.50	570.00
TOTAL			10.10	\$14,058.00



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Plan and Disclosure Statement

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	7.10	\$11,963.50
Fisher, David J.	Partner	6.20	9,796.00
Ringer, Rachael L.	Partner	0.90	1,183.50
Rosenbaum, Jordan M.	Partner	4.00	5,600.00
TOTAL FEES		18.20	\$28,543.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/1/2022	Fisher, David J.	Review Sackler markup of Settlement docs (0.7); prep for call (0.2); conf call with Sackler reps, DPW, Creditor reps (1.0); follow up coordination call re same with Akin and Brown Rudnick (0.3).	2.20	\$3,476.00
9/1/2022	Rosenbaum, Jordan M.	Call with DPW and Sacklers re settlement (1.0); call with Akin and Brown Rudnick re same (0.3).	1.30	1,820.00
9/2/2022	Fisher, David J.	Continued negotiation of CTA with Sackler reps, Akin, Brown Rudnick and DPW (0.9); review related documents (0.5); follow up with Akin, Brown Rudnick (0.3).	1.70	2,686.00
9/2/2022	Rosenbaum, Jordan M.	Call with DPW, Akin, Brown Rudnick, Debevoise and Milbank re settlement.	0.90	1,260.00



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Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/2/2022	Eckstein, Kenneth H.	Call with company, UCC re issues and options for next steps on plan (1.2); review issues and outline same (0.8).	2.00	3,370.00
9/2/2022	Ringer, Rachael L.	Attend portion of call with Debtors and UCC re: next steps on plan process (0.9).	0.90	1,183.50
9/6/2022	Fisher, David J.	Communications with DPW regarding CTA and discussion of issues.	0.80	1,264.00
9/6/2022	Rosenbaum, Jordan M.	Call with Debtor re CTA.	0.80	1,120.00
9/6/2022	Eckstein, Kenneth H.	Meet with Purdue, Sacklers, UCC, States re plan issues (1.6).	1.60	2,696.00
9/8/2022	Eckstein, Kenneth H.	Review correspondence re plan issues (0.5).	0.50	842.50
9/9/2022	Fisher, David J.	Communications with Davis Polk regarding CTA.	0.20	316.00
9/12/2022	Rosenbaum, Jordan M.	Call with DPW, Akin and Brown Rudnick.	0.50	700.00
9/12/2022	Fisher, David J.	Conference call with Akin Gump, Brown Rudnick and J. Rosenbaum regarding CTA issues (0.5); communications with Davis Polk (0.1).	0.60	948.00
9/13/2022	Rosenbaum, Jordan M.	Call with DPW, Akin and Brown Rudnick re CTA.	0.50	700.00
9/13/2022	Fisher, David J.	Conference call with Davis Polk, Akin Gump and Brown Rudnick regarding turn around and comments to CTA (0.5); follow up correspondence with J. Rosenbaum (0.2).	0.70	1,106.00



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Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
9/13/2022	Eckstein, Kenneth H.	Review correspondence from E. Vonnegut re Plan issues and comment on same (1.2).	1.20	2,022.00
9/15/2022	Eckstein, Kenneth H.	Correspond w/ DPW re plan issues (0.5).	0.50	842.50
9/16/2022	Eckstein, Kenneth H.	Call with E. Vonnegut, A. Preis re Plan issues (0.5); review and comment on issues list (0.4).	0.90	1,516.50
9/22/2022	Eckstein, Kenneth H.	Follow up calls w/ DPW re plan issues (0.4).	0.40	674.00
TOTAL			18.20	\$28,543.00

Kramer Levin



November 11, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 868353 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through October 31, 2022.

TOTAL BALANCE DUE	\$46,129.64
Disbursements and Other Charges	4,978.64
Fee Subtotal	41,151.00
Less 50% Discount on Non-Working Travel Matter	(1,424.00)
Fees	\$42,575.00

 ${\tt FEES}~{\tt AND}~{\tt DISBURSEMENTS}~{\tt POSTED}~{\tt AFTER}~{\tt THE}~{\tt BILLING}~{\tt PERIOD}~{\tt SHOWN}~{\tt ON}~{\tt THIS}~{\tt INVOICE}~{\tt WILL}~{\tt APPEAR}~{\tt ON}~{\tt A}~{\tt SUBSEQUENT}~{\tt INVOICE}.$

 $\hbox{\tt DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.}$

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas, New York, NY 10036 T 212.715.9100 F 212.715.8000



November 11, 2022 Invoice #: 868353 072952 Page 2

MATTER SUMMARY

For professional services rendered through October 31, 2022 in connection with the following matters:

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$4,978.64	\$4,978.64
072952-00003	Business Operations	2,944.50	0.00	2,944.50
072952-00004	Case Administration	48.00	0.00	48.00
072952-00006	Employment and Fee Applications	17,838.00	0.00	17,838.00
072952-00008	Litigation	7,237.00	0.00	7,237.00
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	9,974.50	0.00	9,974.50
072952-00010	Non-Working Travel	2,848.00	0.00	2,848.00
072952-00011	Plan and Disclosure Statement	1,685.00	0.00	1,685.00
Subtotal	47,553.64			
Less 50% Discou	(1,424.00)			
TOTAL CURRENT	\$46,129.64			



November 11, 2022 Invoice #: 868353 072952-00003 Page 3

Business Operations

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	0.70	\$850.50
Rosenbaum, Jordan M.	Partner	0.60	840.00
Gange, Caroline	Associate	1.10	1,254.00
TOTAL FEES		2.40	\$2,944.50

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/25/2022	Rosenbaum, Jordan M.	Attend portion of omnibus hearing.	0.60	\$840.00
10/25/2022	Blabey, David E.	Attend portion of omnibus hearing (0.7).	0.70	850.50
10/25/2022	Gange, Caroline	Attend court hearing re pro se matters and adversary proceedings.	1.10	1,254.00
TOTAL			2.40	\$2,944.50



November 11, 2022 Invoice #: 868353 072952-00004 Page 4

Case Administration

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	0.10	\$48.00
TOTAL FEES		0.10	\$48.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/24/2022	Kane, Wendy	Register KL team for omnibus hearing.	0.10	\$48.00
TOTAL			0.10	\$48.00



November 11, 2022 Invoice #: 868353 072952-00006 Page 5

Employment and Fee Applications

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	11.90	\$13,566.00
Kane, Wendy	Paralegal	8.90	4,272.00
TOTAL FEES		20.80	\$17,838.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/10/2022	Gange, Caroline	Review September fee statement for privilege/confidentiality and compliance with UST guidelines.	1.40	\$1,596.00
10/10/2022	Kane, Wendy	Review September fee statement for compliance with UST guidelines and local rules.	0.80	384.00
10/12/2022	Gange, Caroline	Draft and edit Ninth Interim Fee Application.	1.80	2,052.00
10/12/2022	Kane, Wendy	Revise fee application to include amounts owed and prepare exhibits (1.6); compile August fee statement for review (0.1); emails w/ C. Gange and billing re same (0.2); emails w/ AHC professionals re fee statements and file same (0.6).	2.50	1,200.00
10/13/2022	Kane, Wendy	Revise ninth interim fee application and exhibits (1.2); email C. Gange re same (0.2).	1.40	672.00



November 11, 2022 Invoice #: 868353 072952-00006 Page 6

Employment and Fee Applications

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/14/2022	Gange, Caroline	Review and edit AHC professionals interim fee applications.	2.30	2,622.00
10/14/2022	Kane, Wendy	Prepare September fee statement and exhibits.	0.50	240.00
10/17/2022	Gange, Caroline	Review/edit AHC professionals interim fee applications and preparing for filing.	4.60	5,244.00
10/17/2022	Kane, Wendy	Revise August fee statement per R. Ringer comments (0.2); prepare same for filing (0.1); file Otterbourg August fee statement (0.2); file Houlihan July and August fee statements (0.4); review KL interim fee application and exhibits (0.5); compile same for filing (0.2); review and file interim fee applications for Otterbourg, Gilbert, FTI, Houlihan, and Kramer Levin (1.8); service of same and emails w/ professionals re same (0.3).	3.70	1,776.00
10/18/2022	Gange, Caroline	Emails w/ fee examiner re fee data.	0.10	114.00
10/19/2022	Gange, Caroline	Review September fee statements for privilege/confidentiality and compliance with UST guidelines.	0.70	798.00
10/20/2022	Gange, Caroline	Review September fee statement for privilege/confidentiality and compliance with UST guidelines.	1.00	1,140.00
TOTAL			20.80	\$17,838.00



November 11, 2022 Invoice #: 868353 072952-00008 Page 7

Litigation

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Caplan, Jonathan S.	Partner	1.00	\$1,425.00
Gange, Caroline	Associate	2.60	2,964.00
Ortega-Rodriguez, Sealtiel	Associate	3.20	2,848.00
TOTAL FEES		6.80	\$7,237.00

PROFESSIONAL SERVICES DETAIL

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/4/2022	Ortega-Rodriguez, Sealtiel	Monitor closing arguments for Purdue v. Accord; draft summary of same (3.2).	3.20	\$2,848.00
10/6/2022	Caplan, Jonathan S.	Review S. Ortega-Rodriguez summary of trial.	0.60	855.00
10/10/2022	Caplan, Jonathan S.	Review and respond to emails re Accord litigation.	0.40	570.00
10/10/2022	Gange, Caroline	Draft/edit memo re patent litigation (0.7); emails w/ S. Oretega-Rodriguez re same (0.1).	0.80	912.00
10/18/2022	Gange, Caroline	Review Ascent adversary pleadings and emails w/ DPW re same.	1.00	1,140.00
10/20/2022	Gange, Caroline	Review draft pleadings re Ascent adversary proceeding.	0.80	912.00
TOTAL			6.80	\$7,237.00

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November 11, 2022 Invoice #: 868353 072952-00009 Page 8

Meetings and Communications with Ad-Hoc Committee & Creditors

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	0.20	\$243.00
Caplan, Jonathan S.	Partner	1.20	1,710.00
Eckstein, Kenneth H.	Partner	2.30	3,875.50
Gange, Caroline	Associate	2.70	3,078.00
Ortega-Rodriguez, Sealtiel	Associate	1.20	1,068.00
TOTAL FEES		7.60	\$9,974.50

PROFESSIONAL SERVICES DETAIL

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/11/2022	Caplan, Jonathan S.	Prepare for (0.7) and conduct call with client re Purdue trial, next steps (0.5).	1.20	\$1,710.00
10/11/2022	Ortega-Rodriguez, Sealtiel	Prepare for meeting with clients re: Accord trial (0.6), attend client meeting (0.5), and review summary emails (0.1).	1.20	1,068.00
10/11/2022	Gange, Caroline	Attend working group call re patent litigation and case status (0.5); draft memo to AHC re patent litigation (1.0).	1.50	1,710.00
10/13/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
10/25/2022	Eckstein, Kenneth H.	Review Windstream opinion and memo to client re same (1.0).	1.00	1,685.00

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November 11, 2022 Invoice #: 868353 072952-00009 Page 9

Meetings and Communications with Ad-Hoc Committee & Creditors

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/25/2022	Blabey, David E.	Email C. Gange re Windstream decision (0.2).	0.20	243.00
10/25/2022	Eckstein, Kenneth H.	Attend Working Group call (0.5).	0.50	842.50
10/25/2022	Gange, Caroline	Draft AHC updates re Windstream ruling and court hearing.	0.80	912.00
10/25/2022	Gange, Caroline	Attend working group call re case status.	0.40	456.00
TOTAL			7.60	\$9,974.50



November 11, 2022 Invoice #: 868353 072952-00010 Page 10

Non-Working Travel

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Ortega-Rodriguez, Sealtiel	Associate	3.20	\$2,848.00
TOTAL FEES		3.20	\$2,848.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/4/2022	Ortega-Rodriguez, Sealtiel	Travel to/from Accord hearing (3.2).	3.20	\$2,848.00
TOTAL			3.20	\$2,848.00



November 11, 2022 Invoice #: 868353 072952-00011 Page 11

Plan and Disclosure Statement

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	1.00	\$1,685.00
TOTAL FEES		1.00	\$1,685.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/12/2022	Eckstein, Kenneth H.	Call with A. Preis, E. Vonnegut re Plan issues (1.0).	1.00	\$1,685.00
TOTAL			1.00	\$1,685.00

Kramer Levin



December 20, 2022

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 871320 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through November 30, 2022.

Fees \$33,987.00

Disbursements and Other Charges 2,195.19

TOTAL BALANCE DUE \$36,182.19

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



December 20, 2022 Invoice #: 871320 072952 Page 2

MATTER SUMMARY

For professional services rendered through November 30, 2022 in connection with the following matters:

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$2,195.19	\$2,195.19
072952-00003	Business Operations	1,710.00	0.00	1,710.00
072952-00004	Case Administration	420.00	0.00	420.00
072952-00006	Employment and Fee Applications	5,832.00	0.00	5,832.00
072952-00008	Litigation	2,802.00	0.00	2,802.00
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	5,853.00	0.00	5,853.00
072952-00011	Plan and Disclosure Statement	17,370.00	0.00	17,370.00
Subtotal	-	33,987.00	2,195.19	36,182.19
TOTAL CURRENT INVOICE				\$36,182.19



December 20, 2022 Invoice #: 871320 072952-00003 Page 3

Business Operations

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	1.50	\$1,710.00
TOTAL FEES		1.50	\$1,710.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/16/2022	Gange, Caroline	Prep for (0.3); attend omnibus hearing (1.2).	1.50	\$1,710.00
TOTAL			1.50	\$1,710.00



December 20, 2022 Invoice #: 871320 072952-00004 Page 4

Case Administration

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	0.20	\$228.00
Kane, Wendy	Paralegal	0.40	192.00
TOTAL FEES		0.60	\$420.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/8/2022	Kane, Wendy	Review notice of omnibus hearing dates and update case calendar.	0.10	\$48.00
11/15/2022	Gange, Caroline	Coordinate registration for hearing.	0.20	228.00
11/15/2022	Kane, Wendy	Register KL team and A. Benjamin for omnibus hearing.	0.20	96.00
11/16/2022	Kane, Wendy	Calls to chambers re hearing line for A. Benjamin; emails to A. Benjamin and C. Gange re same.	0.10	48.00
TOTAL			0.60	\$420.00



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Employment and Fee Applications

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	3.60	\$4,104.00
Kane, Wendy	Paralegal	3.60	1,728.00
TOTAL FEES		7.20	\$5,832.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/1/2022	Gange, Caroline	Finalize September fee statement.	0.30	\$342.00
11/1/2022	Kane, Wendy	Revise September fee statement and email C. Gange re same.	0.20	96.00
11/3/2022	Gange, Caroline	Review and finalize September invoice.	1.00	1,140.00
11/3/2022	Kane, Wendy	Prepare fee statement for filing; email C. Gange re same; file fee statement.	0.40	192.00
11/8/2022	Kane, Wendy	Review October fee statement for compliance with UST guidelines and local rules (0.5); further review same and send to C. Gange (0.1).	0.60	288.00
11/10/2022	Gange, Caroline	Review and respond to fee examiner inquiries (0.3); review October invoice for privilege/confidentiality and compliance with UST guidelines (0.5).	0.80	912.00



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Employment and Fee Applications

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/15/2022	Gange, Caroline	Review interim fee order (0.4) and emails w/ AHC professionals re same (0.2).	0.60	684.00
11/15/2022	Kane, Wendy	Coordinate with other professional re September and October fee statements and file same (0.5); prepare KL October fee statement (0.4); email C. Gange re same (0.1).	1.00	480.00
11/16/2022	Kane, Wendy	Review proposed fee order (0.8); calls w/ F. Arias re same (0.2); email C. Gange re same (0.1).	1.10	528.00
11/21/2022	Gange, Caroline	Review October fee statements for privilege/confidentiality and compliance with UST guidelines.	0.90	1,026.00
11/21/2022	Kane, Wendy	Revise fee statement and file same; email C. Gange re same.	0.30	144.00
TOTAL			7.20	\$5,832.00



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Litigation

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Shifer, Joseph A.	Spec Counsel	1.20	\$1,434.00
Gange, Caroline	Associate	1.20	1,368.00
TOTAL FEES		2.40	\$2,802.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/10/2022	Gange, Caroline	Review Debtors draft motion to dismiss equitable subordination adversary proceeding (0.7); emails w/ D. Blabey re same (0.1); attend call w/ Debtors and UCC re same (0.4).	1.20	\$1,368.00
11/21/2022	Shifer, Joseph A.	Emails with D. Blabey re Abbott tolling extension (0.2), draft (0.8) and email same to counsel (0.2).	1.20	1,434.00
TOTAL			2.40	\$2,802.00



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Meetings and Communications with Ad-Hoc Committee & Creditors

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	3.00	\$5,055.00
Gange, Caroline	Associate	0.70	798.00
TOTAL FEES		3.70	\$5,853.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/1/2022	Eckstein, Kenneth H.	Prepare for (0.3) and attend Working Group call (0.7).	1.00	\$1,685.00
11/1/2022	Gange, Caroline	Attend working group call re case status.	0.70	798.00
11/10/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8); review related correspondence and pleadings (0.6).	1.40	2,359.00
11/29/2022	Eckstein, Kenneth H.	Attend Working Group call (0.6).	0.60	1,011.00
TOTAL			3.70	\$5,853.00



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Plan and Disclosure Statement

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	4.70	\$7,919.50
Ringer, Rachael L.	Partner	0.80	1,052.00
Rogoff, Adam C.	Partner	0.70	1,088.50
Rosenbaum, Jordan M.	Partner	1.20	1,680.00
Taub, Jeffrey	Spec Counsel	0.80	956.00
Gange, Caroline	Associate	4.10	4,674.00
TOTAL FEES		12.30	\$17,370.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/1/2022	Eckstein, Kenneth H.	Call with protentional NewCo board member re status (0.6).	0.60	\$1,011.00
11/25/2022	Rosenbaum, Jordan M.	Review of plan issues.	0.40	560.00
11/28/2022	Eckstein, Kenneth H.	Review plan issues (1.2); correspondence with J. Rosenbaum, J. Taub same (0.4).	1.60	2,696.00
11/28/2022	Gange, Caroline	Review background re plan issues.	1.20	1,368.00
11/29/2022	Rogoff, Adam C.	Attend call w/ K. Eckstein, R. Ringer, C. Gange, J. Rosenblum and J. Taub re plan and term sheet.	0.70	1,088.50



December 20, 2022 Invoice #: 871320 072952-00011 Page 10

Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/29/2022	Rosenbaum, Jordan M.	Attend portion of call with K. Eckstein, R. Ringer, A. Rogoff, C. Gange, J. Taub re term sheet.	0.60	840.00
11/29/2022	Eckstein, Kenneth H.	Attend call with A. Rogoff, J. Rosenbaum, C. Gange re plan issues (0.7); email A. Rogoff re same (0.1).	0.80	1,348.00
11/29/2022	Ringer, Rachael L.	Prepare for (0.1) and attend call with KL team re: next steps (0.7).	0.80	1,052.00
11/29/2022	Taub, Jeffrey	Attend internal KL call re plan issues (0.7), review same (0.1).	0.80	956.00
11/29/2022	Gange, Caroline	Attend call w/ K. Eckstein, A. Rogoff, J. Rosenbaum, R. Ringer and J. Taub re plan issues (0.7); review documents and issues re same (2.0); call and emails w/ A. Rogoff re same (0.2).	2.90	3,306.00
11/30/2022	Eckstein, Kenneth H.	Call with E. Vonnegut, A. Preis re plan issues (0.8); follow up calls re case issues (0.5); correspond with M. Diaz re asset sale issues (0.4).	1.70	2,864.50
11/30/2022	Rosenbaum, Jordan M.	Review of plan documents.	0.20	280.00
TOTAL			12.30	\$17,370.00

Kramer Levin



January 27, 2023

Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Invoice #: 873791 072952 Page 1

FOR PROFESSIONAL SERVICES rendered through December 31, 2022.

Fees \$43,506.50

Disbursements and Other Charges 136.10

TOTAL BALANCE DUE \$43,642.60

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339



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072952 Page 2

MATTER SUMMARY

For professional services rendered through December 31, 2022 in connection with the following matters:

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$136.10	\$136.10
072952-00003	Business Operations	4,579.50	0.00	4,579.50
072952-00004	Case Administration	288.00	0.00	288.00
072952-00006	Employment and Fee Applications	1,068.00	0.00	1,068.00
072952-00008	Litigation	1,960.00	0.00	1,960.00
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	4,966.00	0.00	4,966.00
072952-00011	Plan and Disclosure Statement	30,645.00	0.00	30,645.00
Subtotal		43,506.50	136.10	43,642.60
TOTAL CURRENT	\$43,642.60			



January 27, 2023 Invoice #: 873791 072952-00001 Page 3

Asset Analysis and Recovery

DISBURSEMENTS AND OTHER CHARGES SUMMARY

DESCRIPTION	AMOUNT
Pacer Online Research	\$0.50
Transcript Fees	135.60
TOTAL DISBURSEMENTS AND OTHER CHARGES	\$136.10



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Business Operations

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	1.50	\$2,527.50
Gange, Caroline	Associate	1.80	2,052.00
TOTAL FEES		3.30	\$4,579.50

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/8/2022	Gange, Caroline	Emails w/ FTI re PHI update.	0.20	\$228.00
12/12/2022	Eckstein, Kenneth H.	Call with company re PHI presentation (1.0); review follow-up emails re same (0.5).	1.50	2,527.50
12/12/2022	Gange, Caroline	Attend call w/ Company re PHI updated (1.0); draft email to K. Eckstein re same (0.4).	1.40	1,596.00
12/16/2022	Gange, Caroline	Review FTI PHI update.	0.20	228.00
TOTAL			3.30	\$4,579.50



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Case Administration

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	0.60	\$288.00
TOTAL FEES		0.60	\$288.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/5/2022	Kane, Wendy	Email Chambers and C. Gange re public dial in line for Ascent hearing.	0.10	\$48.00
12/14/2022	Kane, Wendy	Review docket and compile Akin invoices; email C. Gange re same.	0.50	240.00
TOTAL			0.60	\$288.00



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Employment and Fee Applications

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	0.60	\$684.00
Kane, Wendy	Paralegal	0.80	384.00
TOTAL FEES		1.40	\$1,068.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/7/2022	Kane, Wendy	Review November fee statement for compliance with UST guidelines and local rules.	0.50	\$240.00
12/16/2022	Kane, Wendy	Email Gilbert re fee statement and file same (0.3).	0.30	144.00
12/20/2022	Gange, Caroline	Review November fee statement for privilege/confidentiality and compliance with UST guidelines.	0.60	684.00
TOTAL			1.40	\$1,068.00



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Litigation

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Shifer, Joseph A.	Spec Counsel	0.40	\$478.00
Gange, Caroline	Associate	1.30	1,482.00
TOTAL FEES		1.70	\$1,960.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/5/2022	Shifer, Joseph A.	Emails with D. Blabey and M. Tobak re tolling agreement.	0.40	\$478.00
12/6/2022	Gange, Caroline	Attend portion of Ascent hearing.	1.30	1,482.00
TOTAL			1.70	\$1,960.00



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Meetings and Communications with Ad-Hoc Committee & Creditors

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	2.00	\$3,370.00
Gange, Caroline	Associate	1.40	1,596.00
TOTAL FEES		3.40	\$4,966.00

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/6/2022	Eckstein, Kenneth H.	Attend Working Group call (0.5).	0.50	\$842.50
12/13/2022	Eckstein, Kenneth H.	Attend Working Group call (0.7).	0.70	1,179.50
12/13/2022	Gange, Caroline	Attend working group call.	0.70	798.00
12/20/2022	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,348.00
12/20/2022	Gange, Caroline	Attend working group call.	0.70	798.00
TOTAL			3.40	\$4,966.00



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Plan and Disclosure Statement

PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	5.50	\$9,267.50
Rogoff, Adam C.	Partner	6.30	9,796.50
Rosenbaum, Jordan M.	Partner	1.80	2,520.00
Taub, Jeffrey	Spec Counsel	1.00	1,195.00
Gange, Caroline	Associate	6.90	7,866.00
TOTAL FEES	21.50	\$30,645.00	

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/1/2022	Rosenbaum, Jordan M.	Review of plan documents.	0.30	\$420.00
12/2/2022	Rosenbaum, Jordan M.	Review of plan issues.	0.40	560.00
12/2/2022	Eckstein, Kenneth H.	Call with company, UCC re settlement status (0.8); follow up call and correspond re same (0.4).	1.20	2,022.00
12/4/2022	Rogoff, Adam C.	Review plan issues and related materials.	1.10	1,710.50
12/5/2022	Rosenbaum, Jordan M.	Attend portion of call w/ A. Rogoff and C. Gange re plan issues.	0.50	700.00
12/5/2022	Rogoff, Adam C.	Call w/ J. Rosenbaum, C. Gange re plan issues and related materials.	0.60	933.00



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Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/5/2022	Taub, Jeffrey	T/c w/ KL team re plan issues.	0.30	358.50
12/5/2022	Gange, Caroline	Review plan issues (1.3); call w/ A. Rogoff and J. Rosenbaum re same. (0.6).	2.90	3,306.00
12/6/2022	Rogoff, Adam C.	Prepare for (0.5) and participate in call w/ K. Eckstein, C. Gange, J. Rosenbaum, and J. Taub re plan next steps (0.7); review materials re same (1.6).	2.80	4,354.00
12/6/2022	Rosenbaum, Jordan M.	Attend majority of call with K. Eckstein, A. Rogoff, C. Gange, J. Taub re plan issues.	0.60	840.00
12/6/2022	Eckstein, Kenneth H.	Review correspondence from DPW re plan issues and documents (1.0); call with A. Rogoff, J. Rosenbaum, J. Taub and C. Gange re plan options (0.7); correspond with M. Diaz re company presentation (0.3).	2.00	3,370.00
12/6/2022	Taub, Jeffrey	Attend call w/ KL Bankruptcy team and J. Rosenbaum re plan issues.	0.70	836.50
12/6/2022	Gange, Caroline	Call w/ K. Eckstein, A. Rogoff, J. Taub and J. Rosenbaum re plan issues (0.7); follow-up w/ A. Rogoff re same (0.4); legal research re same (2.9).	4.00	4,560.00
12/8/2022	Rogoff, Adam C.	Review materials re plan issues and structure (0.5); and discuss w/ C. Gange re same.	0.90	1,399.50
12/13/2022	Eckstein, Kenneth H.	Review documents re plan, Avrio, PHI (0.6).	0.60	1,011.00



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Plan and Disclosure Statement

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
12/15/2022	Rogoff, Adam C.	Review materials re plan issues and structure.	0.90	1,399.50
12/16/2022	Eckstein, Kenneth H.	Call with A. Preis re de minimus asset sale and proceeds (0.3); call w/ M. Diaz re same (0.4); call with R. Ringer re same (0.3).	1.00	1,685.00
12/20/2022	Eckstein, Kenneth H.	Correspond with A. Preis re plan/sale issues (0.3); review plan documents (0.4).	0.70	1,179.50
TOTAL			21.50	\$30,645.00

Exhibit G

Budget and Staffing Plan

BUDGET

September 1, 2022 – December 31, 2022

	PROJECT CATEGORY	HOURS BUDGETED	FEES BUDGETED	ACTUAL HOURS	ACTUAL FEES
		BUDGETED	BUDGETED	BILLED	SOUGHT
00001	Asset Analysis and Recovery	100	\$100,000		
00003	Business Operations	300	\$300,000	10.30	\$12,768.00
00004	Case Administration	100	\$100,000	1.30	\$756.00
00006	Employment and Fee Applications	100	\$100,000	36.40	\$30,585.00
0007	Emergency Financing			0.00	0.00
00008	Litigation	650	\$650,000	56.50	\$58,534.00
00009	Meetings and Communications with	500	\$500,000	24.80	\$34,851.50
	Ad-Hoc Committee & Creditors				
00010	Non-Working Travel	0.00	\$0.00	3.20	\$1,424.00
00011	Plan and Disclosure Statement	3000	\$3,000,000	53.00	\$78,243.00
	TOTAL	5000	\$5,000,000.00	185.50	\$217,161.50

STAFFING PLAN

Category of	Range of Hourly Rate	
Timekeeper		
Partner	\$1,200 - \$1,685	
Counsel/Special Counsel	\$1,100 - \$1,660	
Associate/Law Clerk	\$675 - \$1,195	
Paralegal	\$340 - \$520	

EXHIBIT H

Blended Hourly Rate Summary

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES FOR THE TENTH INTERIM FEE PERIOD

TITLE	Non-Bankruptcy Blended Hourly Rate (\$) – FY22 (New York Office Only)	Committee Blended Hourly Rate in Application (\$)
Partner	1,360	1,568
Counsel	1,275	N/A
Special Counsel	1,140	1,195
Associate/Law Clerk	928	1,024
Paralegal	427	480
Aggregate Blended Rate	1,042	1,178